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CLERK OF THE
EXECUTIVE SECRETARY

Petition by ICG TELECOM GROUP, INC.
for Arbitration of an Interconnection
Agreement with BELLSOUTH
TELECOMMUNICATIONS, INC. Pursuant to
Section 252(b) of the Telecommunication
Act of 1996

Filed: September 20, 1999

ICG Telecom Group, Inc., (“ICG”) moves to submit the attached, late-filed objection to discovery submitted in this proceeding by BellSouth Telecommunications, Inc. (“BST” or “BellSouth”). In support of the motion, ICG submits the following.


Objections to discovery in Tennessee were originally filed on September 20, 1999. Response to discovery were originally due one week later on September 27, 1999. At this time, however, discovery responses in Tennessee have been delayed until October 20, 1999, more than three weeks from the date of this filing.

If the parties are unable to resolve this issue, the twenty-two days between the filing of this objection and the due date for filing discovery responses should provide more than ample time for the Hearing Officer to make a decision on the merits of the objection without any delay in these proceedings.

Since the late filing of the objection will not prejudice any party or delay these proceedings, ICG moves to submit the attached objection to BST's "Request for Production of Document" no. 11.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 


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P.O. Box 198062
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Attorney for ICG Telecom Group, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following on this the 29th day of September, 1999.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

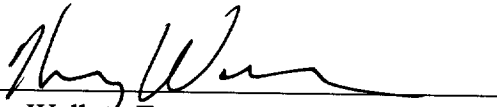

Henry Walker

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